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February 22, 2022

Hon. Jesse M. Furman
United States District Judge
District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Appointment as associate standby counsel, *United States v. Schulte*, 1:17-cr-548-JMF

Your Honor:

I write to request the Court appoint Shayana D. Kadilal under the Criminal Justice Act as associate standby counsel to Mr. Schulte in *United States v. Schulte*, 1:17-cr-548-JMF.

I have known and worked with Mr. Kadilal for the last 7 years – first as a colleague and later as a friend. Mr. Kadilal is a member of the bars of this Court and the Second Circuit. He has held a Top Secret//SCI security clearance in relation to the Guantánamo habeas and military commission litigation for the past 14 years and has extensive experience with the handling of classified information.

As his resume, exhibit A, reflects Mr. Kadilal's primary experience since graduating law school has been in the area of civil litigation, with an emphasis on appellate litigation. While his exposure to criminal litigation is limited our skill sets are complimentary. We are part of the same habeas team for two detainees at Guantánamo. Mr. Kadilal assisted us and the CISO with CIPA, classification, and public access issues during the first trial in this case and I expect Mr. Kadilal's role now to be confined to those issues.

I thank the Court for its time and consideration of this request, and respectfully request it be granted.

Respectfully submitted,

/s/Sabrina P. Shroff

Stand by counsel to Joshua A. Schulte

SPS/mtf

Application GRANTED. Shayana D. Kadilal is hereby appointed under the Criminal Justice Act as associate standby counsel to Defendant Joshua Schulte in *United States v. Schulte*, 17-CR-548 (JMF). The Court will shortly enter an Amended Protective Order in this case, *see* ECF No. 713, and Mr. Kadilal will be required to sign the Memorandum of Understanding attached the Protective Order prior to beginning work in this case. SO ORDERED.



February 23, 2022